

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 04-10156-WGY
)	
JOHN CHU and SUNNY BAI,)	
Defendants)	

PETITION FOR WRIT OF HABEAS CORPUS AD TESTIFICANDUM

The United States of America, by and through its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby respectfully requests that this Court issue a Writ of Habeas Corpus Ad Testificandum to the Essex County Correctional Facility, in Middleton, Massachusetts, for the purpose of securing ZHU Zhaoxin to testify in the trial before Chief United States District Court Judge William G. Young in the above-captioned case on July 27, 2004 at 9:00 a.m. In support of this petition, the government states that:

1. That ZHU Zhaoxin is presently confined at the Essex County Correctional Facility and will be so confined July 27, 2004.
2. That ZHU Zhaoxin has been called to be a witness in the trial in the above-captioned case.
3. That ZHU Zhaoxin is due to appear before Chief United States District Court Judge William G. Young for this purpose on July 27, 2005 at 9:00 a.m..

WHEREFORE, the government requests that this Court issue a Writ of Habeas Corpus Ad Testificandum to be directed to the United States Marshal for the District of Massachusetts, to the Superintendent of the Essex County Correctional Facility, and to any other person having custody and control of ZHU Zhaoxin, commanding them to produce ZHU Zhaoxin before Chief United

States District Court Judge William G. Young at the United States Courthouse, 1 Courthouse Way,
at Boston, Massachusetts on July 27, 2005 at 9:00 a.m.

Respectfully submitted,

Michael J. Sullivan
United States Attorney

By:

/s/ Gregory Moffatt
GREGORY MOFFATT
Assistant U.S. Attorney

July 19, 2005

ALLOWED:

CHIEF UNITED STATES DISTRICT JUDGE

Dated: